



MONTANA  
TELECOMMUNICATIONS  
ASSOCIATION



May 4, 2011

Marlene Dortch, Secretary  
Federal Communications Commission  
334 12<sup>th</sup> Street, SW  
Washington, D.C.

*In the Matter of*

Rural Health Care Support Mechanism

WC Docket No. 02-60

Dear Ms. Dortch,

On April 28, 2011, Ms. Betty Buckley, Executive Director of the Washington Independent Telecommunications Association (WITA) and Geoff Feiss, General Manager of the Montana Telecommunications Association (MTA) met with Trent Harkrader, Jamie Susskind, and Erica Myers of the Telecommunications Access Policy Division.

Ms. Buckley and Mr. Feiss noted that in Eastern Montana and across Washington, health care providers and network providers are working collaboratively to leverage telecommunications facilities effectively and efficiently. However, in Western Montana, one rural health care pilot project proposes to overbuild existing network facilities without having demonstrated a need for such overbuilds. Further, the Western Montana pilot project seeks additional funding to construct unnecessary, duplicative network facilities, which threaten to compromise current network investment. The Government Accountability Office (GAO) has recommended that the Commission proceed no further with any health care program funding until the Commission establishes proper goals and measurements for both the pilot and primary programs—recommendations with which MTA concurs. Further, as the MTA has argued in comments to the Commission, the Commission lacks authority to fund infrastructure deployment or implement the proposed infrastructure program.

The pilot program was intended to develop lessons from which the Commission can learn as it proceeds with future implementation of the rural health care program. Washington and Montana provide substantive lessons learned, both good and bad, for the Commission to implement.

Respectfully submitted,

/s/

Geoff Feiss, General Manager  
Montana Telecommunications Assn  
208 N. Montana Avenue, Suite 105  
Helena, Montana 59601  
406-441-4044  
[gfeiss@telecomassn.org](mailto:gfeiss@telecomassn.org)

/s/

Betty Buckley, Executive Director  
WA Independent Telecom Assn.  
2405 Evergreen Park Dr SW  
Suite B-4  
Olympia, WA 98502  
360-352-5453  
[bettyb@wita-tel.org](mailto:bettyb@wita-tel.org)

cc. Trent Harkrader  
Jamie Susskind  
Erica Myers